

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

In Re:) 15-08775
Cynthia Lee,) Chapter 13
Debtor(s).) Judge A. Benjamin Goldgar

NOTICE OF MOTION

To the following persons or entities who were served electronically by the Bankruptcy Court:

Glenn Stearns, Ch. 13 Trustee: laushot_j@lisle13.com

To the following persons or entities who were served via regular U.S. Mail:

To all of the persons or entities on the attached service list.

PLEASE TAKE NOTICE that on March 9, 2018, at 9:30 AM, or as soon thereafter as counsel may be heard, I shall appear before the Honorable A. Benjamin Goldgar at North Branch Court, 1792 Nicole Lane, Round Lake Beach, Illinois 60073 (or any other place posted, or before any other Judge who may be sitting in his place and stead), and present the attached **Motion to Expand Time to Allow Debtor to File Claim**, at which time and place you may appear.

_____/s/ John J. Ellmann

CERTIFICATE OF SERVICE

The undersigned does hereby certify that copies of this Notice and attachments were served to the above persons or entities, by depositing same in the U.S. Mail at Wheeling, Illinois 60090, with proper postage prepaid, or served electronically by the Bankruptcy Court, before 5:00 p.m. on February 15, 2018.

_____/s/ John J. Ellmann

John J. Ellmann, A.R.D.C. #6257894
Attorney for the Debtor(s)

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Cynthia Lee
3075 Kathe Lane, Apt. A8
Waukegan, IL 60085

MERRICK BANK
Resurgent Capital Services
PO Box 10368
Greenville, SC 29603-0368

Chrysler Capital
P.O. BOX 961275
FORT WORTH, TX 76161

Premier Bankcard, LLC
c/o Jefferson Capital Systems LLC
PO Box 7999
Saint Cloud, MN 56302-9617

IRS
Internal Revenue Service
Kansas City, MO 64999

Illinois Bell Telephone Company
% AT&T Services, Inc.
Karen A. Cavagnaro - Lead Paralegal
One AT&T Way, Room 3A104
Bedminster, NJ 07921

Illinois Department of Employment
Northern Region
260 East Indian Trail Road
Aurora, IL 60505-1733

CERASTES, LLC
c/o WEINSTEIN AND RILEY, PS
2001 WESTERN AVENUE, STE. 400
SEATTLE, WA 98121

AmeriCash Loans, L.L.C.
P.O. Box 184
Des Plaines, IL 60016

DLJ Mortgage Capital Inc.
c/o Select Portfolio Svc Inc.
Attn: Remittance processing
PO Box 65450
Salt Lake City, UT 84165-0450

Quantum3 Group LLC as agent for
Galaxy Asset Purchasing LLC
PO Box 788
Kirkland, WA 98083-0788

Educational Credit Management Corporation
ECMC
PO BOX 16408
ST. PAUL, MN 55116-0408

Capital One, N.A.
c/o Becket and Lee LLP
POB 3001
Malvern, PA 19355-0701

Cavalry SPV I, LLC
500 Summit Lake Drive, Ste. 400
Valhalla, NY 10595

Atlas Acquisitions LLC
(American Web Loan)
294 Union St.
Hackensack, NJ 07601

Illinois Dept. of Revenue
Bankruptcy Section
P.O. Box 64338
Chicago, IL 60664-0338

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MOTION TO EXPAND TIME TO ALLOW DEBTOR TO FILE CLAIM

NOW COMES the Debtor, Cynthia Lee, by and through her attorneys, David M. Siegel and Associates, LLC, to present this Motion, and in support thereof states as follows:

1. Jurisdiction is proper and venue is fixed in this Court with respect to these parties.
2. On March 12, 2015, the Debtor filed a voluntary petition for relief pursuant to Chapter 13 under Title 11 USC, Glenn Stearns was appointed Trustee in this case, and the Chapter 13 plan was confirmed on July 31, 2015.
3. The deadline to file a proof of claim for all creditors (except a governmental unit) was July 20, 2015.
4. On July 29, 2015 Educational Credit Management Corporation (ECMC) filed Proof of Claim 16-1 for a \$10,119.05 debt for student loans.
5. On August 11, 2017 the Trustee's motion to disallow the claim was granted because claim #16 was not timely filed.
6. The Debtor initially thought the student loans should not be paid through the plan as a "deferred" debt. But now she does want the claim of ECMC to be paid through this plan because the Debtor does not want payments on this non-dischargeable debt deferred or delayed during the pendency of the plan.
7. On February 15, 2018 the Debtor filed Proof of Claim 17 in the amount of \$10,119.50 on

behalf of ECMC so that the claim will be paid through the plan.

WHEREFORE the Debtor prays this Honorable Court enter an order allowing claim 17 of Educational Credit Management Corporation (ECMC) and for other such relief as this Court deems just and proper.

Respectfully Submitted,

/s/ John J. Ellmann

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Attorney for the Debtors

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